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May 11, 2018

MEMO ENDORS

Honorable Kenneth M. Karas
United States District Court
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Kathy Scott*
16 Cr. 626 (KMK)

Dear Judge Karas:

This is an application for an order directing the MDC Brooklyn to provide the defense with a copy of Kathy Scott's medical and mental health records.

Ms. Scott was detained at MDC Brooklyn from November until her recent release.

Ms. Scott has signed a HIPAA release for the defense that was submitted to MDC. Ms. Scott then personally requested the records at the MDC. MDC legal staff has informed us that we must file a FOIA request or submit a subpoena to obtain her records. The defense needs these records for review in connection with Ms. Scott's sentencing currently set for June 27, 2018. We believe that it is unnecessary for a defendant to obtain a formal court-ordered subpoena her own records and that a simple order will do.

Very truly yours,

/s/ RICHARD D. WILLSTATTER
RICHARD D. WILLSTATTER

cc: Andrew S. Dember
Pierre G. Armand
Assistant United States Attorneys

Counsel should provide a draft
order.

So Ordered.
AK M/K
5/12/18